

MEMO ENDORSED**MARGARET M. SHALLEY, ESQ.**

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January 21, 2022

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Courtroom 443
New York, New York 10007

**Re: US v. Armando Gomez
18 Cr. 262 (VEC)**

Honorable Judge Caproni:

I represent Armando Gomez in the above-referenced matter. The Court previously ordered the Government to produce the transcripts in this case in the traditional format with the Spanish transcript of the conversations on one side of the page and the English translations on the other. As a result, the Government has reproduced voluminous materials and transcripts for review with Mr. Gomez. I have sent two additional hard drives to the Government in order for them to produce the transcripts to the defendant in Valhalla jail. However, Mr. Gomez informed me last week that there is a software issue with the most recent productions and he is unable to open them. The purpose of this letter is to respectfully request that the Court Order that Mr. Gomez be provided a disabled laptop in the jail with the discovery preloaded by the Government in order to review the voluminous materials that have been produced. Attached, please find a Proposed Order outlining the request. Accordingly, is it respectfully requested that the Court Order that Mr. Gomez be provided a disabled laptop with the discovery preloaded so that he can effectively review the numerous transcripts that have been produced in his case.

The Court's time and attention to this matter are greatly appreciated.

Respectfully submitted,

/ s /

Margaret M. Shalley

cc: All Counsel
(via ECF)

Defense counsel's letter is not presented as a joint letter with Mr. Arboleda, yet the proposed order pertains to both Mr. Gomez and Mr. Arboleda. By no later than **Tuesday, January 25, 2022**, counsel for Mr. Arboleda must inform the Court whether he joins in Mr. Gomez's request and agrees with the proposed remedy.

By no later than **Wednesday, January 26, 2022**, the Government must respond to Defense counsel's proposal.

The Court reminds the parties that by no later than **the end of the day today, January 21, 2022**, the parties must file a joint letter updating the Court on the status of the litigation and whether the parties believe the conference, currently scheduled for Thursday, January 27, 2022 at 2:00 P.M., is necessary. *See* Endorsement, Dkt. 91. If the parties would like to proceed with the conference, the joint letter should outline the topics the parties would like to discuss at the conference.

SO ORDERED.



Date: January 21, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE